

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

RUSSELL ZINTER, et al;
Plaintiffs,

vs.

CHIEF JOSEPH SALVAGGIO, et al;
Defendants.

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CIVIL NO. SA-18-CV-680-RCL

**STIPULATION OF DISMISSAL OF
DEFENDANTS JORGE BRETON, ALEX KING, AND ERIKA RIVERA**

IT IS HEREBY STIPULATED AND AGREED, pursuant to the Federal Rules of Civil Procedure, Rule 41(a)(1), by and between Plaintiffs Russell Zinter, David Bailey, James Mead, James Springer, Jonathan Green, Jason Green, Theresa Richard, Juan Gonzales, Jr., Kevin Egan, Jack Miller, Brian Howd, Gregory Gardiner, Mark Brown and all Defendants who have appeared in this action, as follows:

1. This action was commenced on July 4, 2018.
2. The action is not a class action; a receiver has not been appointed, and the action is not governed by any statute of the United States that requires an order of the court for dismissal.
3. The allegations and counts against **Defendant Jorge Breton**, solely and only as alleged, are hereby dismissed, in their entirety, with prejudice.
4. The allegations and counts against **Defendants Alex King**, solely and only as alleged, are hereby dismissed, in their entirety, with prejudice.
5. The allegations and counts against **Defendants Erika Rivera**, solely and only as alleged, are hereby dismissed, in their entirety, with prejudice.

6. Individual Defendants and Plaintiffs agree that **Jorge Breton, Alex King, and Erika Rivera** could still be called as fact witnesses at trial.

7. Mr. Frigerio, counsel for **Jorge Breton, Alex King, and Erika Rivera** stipulates that he will make reasonable efforts to present **Jorge Breton, Alex King, and Erika Rivera** as witnesses for trial in this cause if needed.

SIGNED this 31st day of March 2022.

Respectfully Submitted,

GRABLE GRIMSHAW PLLC

/s/ Brandon J. Grable

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